

UNITED STATES DISTRICT COURT  
DISTRICT OF NORTH DAKOTA  
No. 3:25-CR-144

UNITED STATES OF AMERICA	)	
	)	
Plaintiff,	)	<b>MOTION FOR A</b>
	)	<b>DETENTION HEARING</b>
	)	
v.	)	
	)	
	)	
PATRICK SAAH SAMOLU	)	
	)	
Defendant.	)	

Defendant, Patrick Saah Samolu, by his attorney, Anthony M. Bussa, hereby moves the Court for Order to permit Defendant to have a Detention Hearing in this matter. Currently, Defendant is indictment on a drug conspiracy case with four other co-defendant's/co-conspirators. Pursuant to the indictment, Defendant's overt acts regard the alleged sale of 24 grams of fentanyl powder from January 3, 2025 through January 10, 2025. These alleged drug transactions pale in comparison to the larger alleged drug transactions and interactions that the other co-defendant's purportedly engaged in. On July 9, 2025, Defendant was Arraigned on these allegations and pleaded not guilty to these alleged offenses. Correspondingly, a Detention Hearing was set for July 14, 2025 and a Pre-Trial Services Report was prepared by the United States Probation Office. That report specifically elucidated that Defendant possesses very limited criminal history, that Defendant is gainfully employed with stable employment to APS Underground Construction where he is a foreman-type employee; that he is 34 years-old with post-secondary education; that he is a father to 6 children that depend on him and he provides support for them through his employment; and that he has virtually no warrant history prior

to arrest on the Indictment in this case. Consequently, probation recommended the pre-trial release of Defendant conditioned on the admission to a residential re-entry program along with various other strict conditions of release. At the July 14th Detention Hearing, Defendant agreed to these release conditions, and forwent his right to this Detention Hearing at this time, with the belief that Defendant would be admitted relatively expeditiously into a residential re-entry program. However, unbeknownst to Defendant and Defendant's Counsel, there is a substantial waitlist to the admission into any of these programs given the lack of federal funding, and space, for these facilities. Given the unstable and unpredictable current status of the federal government and balancing a budget, there is no timetable of this admission.

After learning this information, Defense Counsel confirmed that Defendant still has his job with APS Underground Construction if he gets released from custody, which is a testament to his work ethic and reliability; that Defendant has stable housing with this girlfriend, Najkiia Williams, and the residence is located at 2220 6th Avenue South in Fargo, North Dakota; that Ms. Williams possesses no current criminal history and is not a known criminal offender, drug dealer or drug addict; that Defendant and Ms. Williams have resided with each other for some time as they share children together; that Ms. Williams was recently physically injured and needs Defendant's help so that so can be best taken care of and so that she can financially support their children; and that Defendant is willing to abide by any release conditions, including daily drug testing and GPS monitoring so that Defendant can demonstrate his compliance with all conditions placed on him while this matter is pending. Moreover, Defendant has been a Fargo, ND resident for 14 years and has no intention to run, to flee, or to go anywhere else as Fargo is his home. Therefore,

given these aforementioned issues that were unknown to Defendant and Defense Counsel at the time of the original Detention Hearing, Defendant respectfully requests that a Detention Hearing be set so that Defendant can argue for his release from custody on a personal recognizance bond with strict conditions attached.

This Motion is based upon all the files, records and proceedings herein.

Respectfully submitted,

Dated: July 22, 2025

**CJB LAW, PLLC**

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